

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of
Amendment of the Part 97 of the Commission's
Amateur Radio Service Rules to Eliminate
Morse Code proficiency testing Requirements
For All Classes of American License

RM - 10786

To The Commission

Comments of Robert Y. Felt

To be brief – I am in total concurrence with the petition filed by No Code International: The FCC should take immediate steps to abolish the CW code exam as a requirement for any amateur radio license privileges. The CW examination process no longer serves any practical or regulatory purpose.

No Practical Purpose - To examine an applicant's motor skills for translating information into dots and dashes with a telegrapher's key as a deciding factor for issuing a license is nonsense and serves no practical purpose. CW is just one of dozens of communication modes in use today. We don't test for an applicants speaking or typing skills, do we?

The art of radio frequency Morse communications is now 107 years old and is rarely used in modern practical communications except by nostalgic amateur communicators. We should respectfully recognize its rightful place in the annals of communication history, supporting the military, international commerce and exploration. But that era is over. There is no requirement for the code, and we must quit encouraging the amateur community's myth "that CW is an essential skill for the amateur radio operator for emergency communications...when all else fails". CW is not used by modern disaster agencies, first responders, FEMA, the military or by any government agencies. It was formally retired by the military, et al, nearly a decade ago.

The authoritative NCVEC stated in its petition (RM- 10787) that"... most amateur applicants never use Morse code again after they pass the test". Amateur CW use appears to be obsolete and is being replaced by the more robust digital waveforms and protocols like PSK, PACTOR, etc. Just compare the number of CW users on any HF amateur band with the growing number of digital users in the narrower upper portion of the band.

No Regulatory Purpose or need - The actions by the ITU at WARC-03 have finally relieved the member states of the regulatory need for the CW exam. The overarching regulatory need for the FCC exam is now moot. Many other member states have already

taken the initiative to abolish it. The United States Government should adopt this position without further debate. We should be leaders, not followers!

I strongly recommend that the FCC immediately demonstrate its leadership and stewardship of the public trust by (1) abolishing the CW testing requirement for amateurs, (2) considering immediately issuing General Class HF licenses to those amateur applicants who have successfully passed the General written exam in the past three (arbitrary) years. (This is a form of reparation to those technically qualified General Class applicants who have been penalized, for one reason or another, for not passing the CW exam.)

Abolish the CW exam, that's the issue – The FCC should focus on abolishment of the CW exam and ignore all of the other convoluted petitions that propose simultaneously changing the licensing structure, amateur bands and operator privileges. These additional proposals just add noise to the process and will prolong the inevitable CW decision with unnecessary public debate. These other proposals should be carefully studied at a later date.

Do the right thing- The FCC should take immediate action to end once and forever this divisive, emotional argument that has been wrenching the amateur community for the past decade and refocus the community and its examination process on the practice of modern state-of-the-art RF communications technologies. Isn't that what it's all about?